

Law Offices of
Walter M. Luers, LLC

The Corbit Building
67 Beaver Avenue, Suite 18
Annandale, New Jersey 08801
Telephone: 908.894.5656
Facsimile: 908.894.5729
www.luerslaw.com

September 4, 2020

Walter M. Luers, Esq.*

*Also admitted in New York

Writer's Direct Email: wluers@luerslaw.com

VIA CM/ECF

Hon. Susan D. Wigenton, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building
50 Walnut Street
Newark, New Jersey 07102

Re: ***Mazo, et al. v. Way, et al.***
Docket No. 2:20-cv-08174-SDW-LDW

Dear Mr. Walsh:

We, along with co-counsel Ryan Morrison, Esq. (admission *pro hac vice* pending) represent the Plaintiffs in the above-referenced action. Currently pending before the Court are the motions to dismiss of Defendant Joanne Rajoppi, Defendant Elaine Flynn, and Defendant Paula Sollami-Covello. All three are currently returnable September 21, 2020. The Rajoppi and Flynn motions have been adjourned once; the Sollami-Covello motion has not been previously adjourned. In addition, Defendant Way must answer or move by September 10, 2020; Defendant Maldonado must answer or move by September 30, 2020; and Defendant Durkin must answer or move by October 5, 2020. (Defendant Peter is in default and has neither communicated with Plaintiffs' counsel or contacted the Court).

So far, the arguments raised in Defendants' motions to dismiss have been similar, and we anticipate that our arguments in opposition will be similar, as well. To reduce the burden on the Court and for the relative convenience of the Court and parties, we request that the three pending motions to dismiss be adjourned and be made returnable November 2, 2020, so as to synchronize the briefing schedules of all of the pending and anticipated motions to dismiss. This should yield a benefit to the Court by permitting the Court to decide all similar motions at the same time, rather than in groups of two or three.

All of the Defendants have consented to our request, except for Defendant Peter, who is in default and who has not entered an appearance.

Hon. Susan D. Wigenton, U.S.D.J.

Page 2 of 2

September 4, 2020

If our request is granted, then the new date for Plaintiffs to serve and file their opposition papers to any pending motion to dismiss would be October 19, 2020, and the new date for Defendants to serve and file their reply papers would be October 25, 2020.

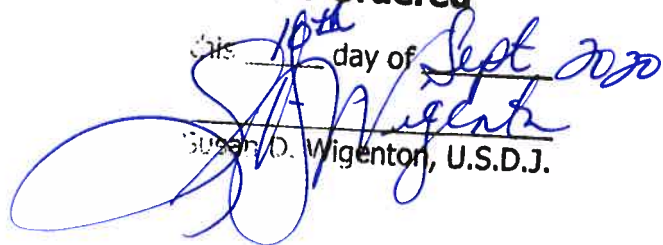
Thank you for your consideration of our request.

Respectfully submitted,

/s/ Walter M. Luers

Walter M. Luers

cc: Counsel of Record

So Ordered
this 10th day of Sept 2020

Susan D. Wigenton, U.S.D.J.